

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

THE ALIERA COMPANIES, INC.
d/b/a Alieria Healthcare, Inc., *et al.*,¹

Debtors.

ALIERA LT, LLC, AS LIQUIDATING
TRUSTEE FOR THE ALIERA
COMPANIES, INC., ET AL. and NEIL F.
LURIA, IN HIS CAPACITY AS THE
TRUSTEE OF THE SHARITY
MINISTRIES, INC., LIQUIDATING
TRUST,

Plaintiffs,

v.

SHELLEY STEELE, CHASE MOSES,
TIMOTHY MOSES, FIRST CALL
TELEMEDICINE, LLC, JDWALTON
NEWNAN LLC, OCONEE REYNOLDS
LLC, CIEL CAPITAL GROUP, INC., and
MOSES FAMILY CHARITABLE FUND,

Defendants.

Chapter 11

Case No. 21-11548 (TMH)
(Jointly Administered)

Adv. Proc. No. 23-50433 (TMH)

**THE STEELE PARTIES' EXHIBIT AND WITNESS
LIST FOR FEBRUARY 19, 2025 HEARING**

Defendants Shelley Steele, First Call Telemedicine, LLC, JDWalton Newnan LLC, Oconee Reynolds LLC, Ciel Capital Group, Inc., and Burdette Atlanta, LLC (collectively, the “Steele Parties”), by and through undersigned counsel, may introduce the following exhibits and

¹ The jointly administered Debtors in these Chapter 11 cases along with the last four digits of their federal tax identification number include: The Alieria Companies Inc. (9555) (Case No. 21-11548), Advevo LLC (6736) (Case No. 22-10124), Ensurian Agency LLC (3244) (Case No. 22-10123), Tactic Edge Solutions LLC (2923) (Case No. 22-10122) and USA Benefits & Administrators LLC (5803) (Case No. 22-10121).

witness testimony in support of *Defendants' Emergency Motion to Enforce Settlement Agreement and for a Temporary Restraining Order and Preliminary Injunction* [Adv. Docket No. 31]. The following list does not include documents or other evidence that may be used solely for impeachment purposes.

EXHIBIT LIST

<u>No.</u>	<u>Title/Description</u>	<u>Docket No.</u>
1	Declaration of Shelley Steele	Adv. D.I. 31-2
2	Settlement Agreement	Adv. D.I. 31-3
3	Deed	Adv. D.I. 31-4
4	Settlement Statement	Adv. D.I. 31-5
5	Email from J. Elrond to E. Miller, 11/30/23	Adv. D.I. 49-1
6	Email chain between J. Elrond and D. Steffenson, 1/15/24 – 3/11/24	Adv. D.I. 49-2
7	Email chain between J. Elrond and D. Steffenson, 3/14/24 – 3/21/24	Adv. D.I. 49-3
8	Email chain between J. Elrond and D. Steffenson, 3/24/24 – 3/25/24	Adv. D.I. 49-4

POTENTIAL WITNESSES

<u>Witness</u>	<u>Expected Testimony</u>
Shelley Steele	Ms. Steele is expected to testify about the relevant settlement agreement, payments made to the Plaintiffs, the listing of the relevant property, any offers for the purchase of the property, efforts to make the estate whole per the agreement including current approved financing that would pay the estate in whole, and related matters.
Travis Reed	Mr. Reed is expected to testify about the listing of the relevant property including the listing prices and offers received for the purchase of the property, and related matters. With the permission of the Court, Mr. Reed will testify remotely.

The Steele Parties reserve the right to use any exhibit listed by any other party and to amend or supplement this witness and exhibit list before the hearing.

Dated: February 13, 2025

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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-and-

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Atlanta, LLC*